

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

In re Janet L. Harris  
Vincent E. Harris  
Debtors

Case No. 17-35621-KRH  
Chapter 13

Address: 1304 Poco Dr. Richmond, VA 23235

SSN: xxx-xx- 9499 and 3082

**NOTICE OF OBJECTION TO PROOF OF CLAIM**

COMES NOW, Vincent E. Harris and Janet L. Harris, ("Debtors"), by counsel has filed an objection to your claim in this bankruptcy case.

**Your claim may be reduced, modified, or eliminated. You should read these papers carefully and discuss them with your attorney if you have one.**

If you do not want the court to eliminate or change your claim, then on or before <30 days from today>, you or your attorney must: (THIRTY days from the filing of the Objection).

File with the court, a written response to the objection, explaining your position at: the address of the bankruptcy clerk's office pursuant to FRBP 3007, within 30 days of the filing of this Objection at below address.

Clerk of Court United States Bankruptcy Court 701 E. Broad Street, Room 4000 Richmond, VA 23219	<u>You must also mail a copy to:</u> Joseph S. Massie, III, Esquire 115 N. 1st Street- Suite 100 Richmond, VA 23219
--	--

If you or your attorney do not take these steps, the court may decide that you do not oppose the objection to your claim.

Massie Law Firm, PC  
Joseph Massie, III, Esquire (Bar No. 35472)  
115 N. 1<sup>st</sup> Street, Suite 100  
Richmond, VA 23219  
(804) 644-4878 (T)  
(804) 644-4874 (F)  
[jmassie@massielawfirm.com](mailto:jmassie@massielawfirm.com)

In re Janet L. Harris  
Vincent E. Harris  
Debtor(s)

Case No. 17-35621-KRH  
Chapter 13

November 2, 2021

RESPECTFULLY SUBMITTED  
Vincent E. Harris  
Janet L. Harris

s/: Joseph S. Massie, III  
Joseph S. Massie, III, Esquire  
115 N.1st Street- Suite 100  
Richmond, VA 23219  
(804) 644-4878 (T)  
(804) 644-4874 (F)

**CERTIFICATE OF SERVICE**

I hereby certify that on May 27, 2021, by first class mail an exact copy of the foregoing Objection to Proof of Claim to Toyota Motor Credit Corporation c/o: Beckett and Lee, LLP, PO Box 3001 Malvern, PA 19355-0701 as well as all Creditors listed below and all necessary Parties.

**American Express Trs  
Po Box 297871  
Fort Lauderdale, FL 33329**

**Amex  
Correspondence  
Po Box 981540  
El Paso, TX 79998**

**Barclays Bank Delaware  
100 S West St  
Wilmington, DE 19801**

**Cap1/dbarn  
Capital One Retail Srvs/Attn: Bankruptcy  
Po Box 30258  
Salt Lake City, UT 84130**

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In re **Janet L. Harris** : Case No. 17-35621-KRH  
**Vincent E. Harris** : Chapter 13  
Debtor(s)

**Capital One  
Attn: Bankruptcy  
Po Box 30253  
Salt Lake City, UT 84130**

**Capital One  
Attn: General Correspondence/Bankruptcy  
Po Box 30285  
Salt Lake City, UT 84130**

**Cash Net USA  
P.O .Box 643990  
Cincinnati, OH 45264**

**Chase Card  
Attn: Correspondence Dept  
Po Box 15298  
Wilmington, DE 19850**

**Citibank / Sears  
Citicorp Credit Services/Attn: Centraliz  
Po Box 790040  
Saint Louis, MO 63179**

**Citibank/The Home Depot  
Citicorp Cr Svcs/Centralized Bankruptcy  
Po Box 790040  
St Louis, MO 63129**

**Conrad Accept  
476 W Vermont Ave  
Escondido, CA 92025**

**Dell Financial Services  
Attn: Bankruptcy  
Po Box 81577  
Austin, TX 78708**

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**Discover Financial  
Po Box 3025  
New Albany, OH 43054**

**Henrico Doctor's Hospital  
P.O. Box 13620  
Richmond, VA 23225**

**Mid America Bank & T  
121 Continental Dr Ste 1  
Newark, DE 19713**

**Midland Funding  
Attn: Bankruptcy  
Po Box 939069  
San Diego, CA 92193**

**Ocwen Loan Servicing, Llc  
Attn: Research/Bankruptcy  
1661 Worthington Rd Ste 100  
West Palm Bch, FL 33409**

**Office of US Trustee  
701 E. Broad Street  
Suite 4300  
Richmond, VA 23219**

**Old Point National Ban  
1 W Mellen St  
Hampton, VA 23663  
Suzanne E. Wade**

**7202 Glen Forest Dr, Ste 202  
Richmond, VA 23226  
Pg. 2 of 3**

**Synchrony Bank  
Attn: Bankruptcy  
Po Box 965060  
Orlando, FL 32896**

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## Synchrony Bank/ JC Penneys

**Attn: Bankruptcy  
Po Box 965060  
Orlando, FL 32896**

## Synchrony Bank/Amazon

**Attn: Bankruptcy  
Po Box 965060  
Orlando, FL 32896**

### **Synchrony Bank/Sams Club**

**Attn: Bankruptcy  
Po Box 965060  
Orlando, FL 32890**

**Synchrony Bank/Walmart**

**Attn: Bankruptcy  
Po Box 965060  
Orlando, FL 32899**

Toyota Motor credit Corp

Po Box 8026

**Cedar Rapids, IA 52408**

## Tricom Management

**4025 E La Palma Avenue # 1 101  
Anaheim, CA 92807**

**Wyndham Vacation Ownership  
6277 Sea Harbor Dr  
Orlando, FL 3282**

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Case No. 17-35621-KRH  
Chapter 13

**OBJECTION TO PROOF OF CLAIM**

**COMES NOW**, Vincent E. Harris and Janet L. Harris, (“Debtors”), by counsel, and pursuant to 11 U.S.C. Rule 3007, Objection to Claim(s), Debtor’s object to claim number 4 by Toyota Motor Credit Corporation.

1. Debtors filed for protection under Chapter 13 of U.S.C. Bankruptcy Code November 10, 2017.
2. On December 14, 2017, Toyota Motor Credit Corporation , filed claim number 4.
3. On February 14, 2019, Toyota Motor Credit Corporation amended the claim to \$13,078.72, thirteen thousand and seventy-eight dollars and seventy-two cents.
4. Debtors object to claim number 4, as they believe that Toyota Motor Credit Corporation failed to sell the vehicle in a commercially reasonable manner, and As a result, failed to recover a reasonable sum and minimize damages. Toyota has a statutory duty to mitigate their damages with a “commercially reasonable sale” pursuant to VA Code 8.9A-610(b). The failure to comply with 8.9A-610 results in entitlement to damages under 8.9A-625 and 8.9A-626, amounting to the entire finance charge plus 10% of the principal and credit for the proper amount of credit, amounting to 5638.86 for the finance charge and 4008.49 for the 10% of the amount financed, reducing

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              Debtor(s)      :

the balance by 9647.35 plus the amount of credit had the collateral been sold properly, reducing the amount from 13,078.72 to 3431.37 plus credit for proper sale in the approximate amount of \$4,000, resulting in a credit balance, not a debt, in the amount of just under \$600.00.

5. The Debtors are requesting that claim number 4 be reduced to \$0.00, zero dollars and zero cents.

WHEREFORE, Debtors request that the Court sustain the objection.

November 2, 2021

RESPECTFULLY SUBMITTED

Vincent E. Harris  
Janet L. Harris

By: /s/: Joseph S. Massie, III  
Joseph S. Massie, III, Esquire  
115 N. 1st Street- Ste 100  
Richmond, Virginia 23219-2125  
(804) 644-4878 (T)  
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*Debtor*

Vincent E. Harris  
Janet L. Harris  
1304 Polo Drive  
Richmond, Virginia 23235

Toyota Motor Credit Corporation  
c/o: Beckett & Lee Law Firm, LLP  
PO Box 3001  
Malvern, PA 19355-0701

### *Trustee*

Suzanne Wade  
PO Box 1780  
Richmond, VA 23230

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Debtor(s) : Case No. 17-35621-KRH  
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**Toyota Motor Credit Corporation  
c/o: Beckett and Lee, LLP,  
PO Box 3001  
Malvern, PA 19355-0701**

**Toyota Motor Credit Corporation  
r/a CT Corporation System  
4701 Cox Rd., Suite 285  
Glen Allen, VA 23060**

**Vincent and Janet Harris  
1304 Poco Dr.  
Richmond, VA 23235**

**Suzanne Wade, Chapter 13 Trustee  
7202 Glen Forest Dr, Ste 202  
Richmond, VA 23226**

as well as all Creditors listed below and all necessary Parties.

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Salt Lake City, UT 84130**

**Capital One  
Attn: General Correspondence/Bankruptcy  
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Salt Lake City, UT 84130**

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            Debtor(s)              :      Chapter 13

**Citibank / Sears  
Citicorp Credit Services/Attn: Centraliz  
Po Box 790040  
Saint Louis, MO 63179**

**Citibank/The Home Depot  
Citicorp Cr Svcs/Centralized Bankruptey  
Po Box 790040  
St Louis, MO 63129**

**Conrad Accep  
476 W Vermont Ave  
Escondido, CA 92025**

**Dell Financial Services  
Attn: Bankruptey  
Po Box 81577  
Austin, TX 78708**

**Discover Financial  
Po Box 3025  
New Albany, OH 43054**

**Henrico Doctor's Hospital  
P.O. Box 13620  
Richmond, VA 23225**

**Mid America Bank & T  
121 Continental Dr Ste 1  
Newark, DE 19713**

**Midland Funding  
Attn: Bankruptey  
Po Box 939069  
San Diego, CA 92193**

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**Attn: Research/Bankruptcy**  
**1661 Worthington Rd Ste 100**  
**West Palm Bch, FL 33409**

**Old Point National Ban**  
**1 W Mellen St**  
**Hampton, VA 23663**

**Synchrony Bank**  
**Attn: Bankruptcy**  
**Po Box 965060**  
**Orlando, FL 32896**  
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**Attn: Bankruptcy**  
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**Synchrony Bank/Walmart**  
**Attn: Bankruptcy**  
**Po Box 965060**  
**Orlando, FL 32896**

**Toyota Motor credit Corp**  
**Po Box 8026**  
**Cedar Rapids, IA 52408**

**Tricom Management**  
**4025 E La Palma Avenue # 1 101**  
**Anaheim, CA 92807**

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**Wyndham Vacation Ownership  
6277 Sea Harbor Dr  
Orlando, FL 3282**

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Debtor(s) : Case No. 17-35621-KRH  
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to comply with 8.9A-610 results in entitlement to damages under 8.9A-625 and 8.9A-626, amounting to the entire finance charge plus 10% of the principal and credit for the proper amount of credit, amounting to 5638.86 for the finance charge and 4008.49 for the 10% of the amount financed, reducing the balance by 9647.35 plus the amount of credit had the collateral been sold properly, reducing the amount from 13,078.72 to 3431.37 plus credit for proper sale in the approximate amount of \$4,000, resulting in a credit balance, not a debt, in the amount of just under \$600.00.

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***Trustee***

Suzanne Wade  
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